

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

DOC NO  
REC'D/FILED

2021 SEP 22 PM 2:16

PETER OPPENEER  
CLERK US DIST COURT  
WD OF WI

UNITED STATES OF AMERICA

INDICTMENT

v.

Case No. \_\_\_\_\_

BAHRULLAH NOORI,

Defendant.

21 CR 092 JDP  
18 U.S.C. § 2241(c)  
18 U.S.C. § 2243(a)  
18 U.S.C. § 7(3)

THE GRAND JURY CHARGES:

COUNT 1

On or about September 11, 2021, in the Western District of Wisconsin, the  
defendant,

BAHRULLAH NOORI,

within the special territorial jurisdiction of the United States, namely Fort McCoy,  
Monroe County, Wisconsin, knowingly attempted to engage in a sexual act with another  
person using force against that person, specifically, Victim-1, who had attained the age  
of 12 years but had not attained the age of 16 years and was at least four years younger  
than the defendant.

(In violation of Title 18, United States Code, Sections 2241(c) and 7(3)).

COUNT 2

Between on or about August 25, 2021 and September 11, 2021, exact date  
unknown, in the Western District of Wisconsin, the defendant,

BAHRULLAH NOORI,

within the special territorial jurisdiction of the United States, namely Fort McCoy, Monroe County, Wisconsin, knowingly engaged in a sexual act with another person, Victim-2, who had attained the age of 12 years but had not attained the age of 16 years and was at least four years younger than the defendant. Specifically, at night in a barrack at Fort McCoy, the defendant touched Victim-2's genitalia under Victim-2's clothing.

(In violation of Title 18, United States Code, Sections 2243(a) and 7(3)).

COUNT 3

Between on or about August 25, 2021 and September 11, 2021, exact date unknown, in the Western District of Wisconsin, the defendant,

BAHRULLAH NOORI,

within the special territorial jurisdiction of the United States, namely Fort McCoy, Monroe County, Wisconsin, knowingly engaged in a sexual act with another person, Victim-2, who had attained the age of 12 years but had not attained the age of 16 years and was at least four years younger than the defendant. Specifically, during the day in a bathroom at Fort McCoy, the defendant touched Victim-2's genitalia under Victim-2's clothing.

(In violation of Title 18, United States Code, Sections 2243(a) and 7(3)).

COUNT 4

On or about September 11, 2021, in the Western District of Wisconsin, the defendant,


BAHRULLAH NOORI,

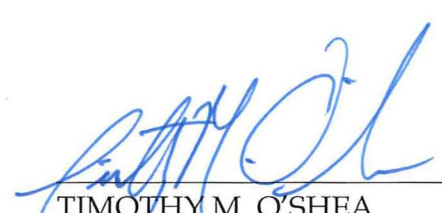
within the special territorial jurisdiction of the United States, namely Fort McCoy, Monroe County, Wisconsin, knowingly engaged in a sexual act with another person using force against that person, specifically, Victim-2, who had attained the age of 12 years but had not attained the age of 16 years and was at least four years younger than the defendant. Specifically, at night in a bathroom at Fort McCoy, the defendant, using force, touched Victim-2's genitalia under Victim-2's clothing.

(In violation of Title 18, United States Code, Sections 2241(c) and 7(3)).

A TRUE BILL

  
PRESIDING JUROR

Indictment returned:  09/22/21

  
TIMOTHY M. O'SHEA  
Acting United States Attorney